Before the

FEDERAL COMMUNICATIONS COMMISSION 5 1996
Office of Secretary 1996
Office of Secretary 1996 In the Matter of Guidelines for Evaluating the Environmental) and Report and Order FCC 96-326 Effects of Radiofrequency Radiation

The Secretary Federal Communications Commission 1919 M Street, N.W. Room 222 Washington, D.C. 20554

To: The Commission

DOCKET FILE COPY ORIGINAL Response to "Notice of Public Information Collections Being Reviewed by the Federal Communications Commission"

These comments are being timely filed by the Ad-Hoc Association of Parties Concerned About the Federal Communications Commission Health and Safety Rules (the "Association") in response to a "Notice of Public Information Collections Being Reviewed by the Federal Communications Commission" ("Collections Notice") published in the Federal Register August 13, 1996, Vol. 61, No. 157 page 422021, requesting comments be submitted by October 15, 1996, and such comments are being directed to Dorothy Conway as specified in the Collections Notice.

Comments are hereby given in response to the following concerns given in the Collections Notice:

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility.

Insofar as the specific information to be collected by the Commission is still to be determined, herein are listed information that is needed for the proper performance of the functions of the Commission and how such information will have practical utility.

- 1. Information item: Antenna specifications including:
- (1) maximum effective radiated power per channel requested in the license application,
- (2) number of channels,
- (3) minimum and maximum distance from ground of antennas and distance from ground for each antenna transmitter
- (4) antenna geographic coordinates to the nearest 10 feet (using new satellite technology to specify exact longitude and latitude,
- (5) whether transmitters are omnidirectional or directional (if directional use codes provided by the Commission to approximately characterize the vertical and horizontal propagation pattern)
- (6) Signal modulation pattern (using codes provided by the Commission)
- (7) Frequency bands for receiving and for transmitting signals
- (8) Licensee data: Company name, address, phone/fax, contact persons to get further details.
- (9) Other parameters as deemed needed based on a representative sampling of sites to be studies to determine if there may be adverse health effects from very low level chronic radio frequency exposure.

Utility: Using above information power density estimates can be computed using Commission database of similar antenna from other operators in the area. By having relatively exact geographic coordinates it is possible for any operator to determine what are the other operators in the local area, output power, and approximate estimates of its propagation. This provides the minimum information to make approximate estimates of total exposure - necessary for determining if Commission exposure criteria are met. If further information is needed this should be added.

While estimates of power density based on the above would supposedly be 'worst case' - since they would be based on the maximum effective radiated power ("ERP") allotted to a carrier, they could still give crude estimates of exposure. In most cases, even a crude over estimate may

find a site in compliance, and therefore not needing to have to provide a detailed environmental assessment.

Moreover, many operators correctly note that making actual measurements on all transmitters not categorically excluded may be very time consuming. To help assure an efficient, non-burdensome, implementation of the Commission's new rules, using worst case approximations based on allowed maximum ERP may provide a good compromise between assuring compliance and avoiding costly time consuming measurement for many transmitters in a short time. On a random sample basis the Commission could verify that the above method is sufficient for implementing the Commission's rules.

Moreover, even if physical measurements were made and over a 24 hour period it is not clear that 'worst case' exposures would be considered. For example, in rainy weather, power density may need to be dramatically increased to assure penetration of the signal through the air. Yet it is unlikely measurements would be made during such adverse weather conditions.

Also, exposures in the homes, schools, or workplaces may include reflections off 90 degree electrically reflective corners (e.g. file cabinets, or metal storage cabinets placed to form a 90 degree corner). Such 90 degree corner reflections can increase power density exposures up to 16 fold or more. Likewise, wearing metal eye-glass frames can also increase exposure to the eye [see the Association petition for reconsideration page 7,8]. Thus, worst case approximations

Moreover, since there is little information of health effects from chronic exposure to low levels of radio frequency irradiation, the above data will provide useful information to the Commission and to the federal health agencies to which the Commission defers for advice on radio frequency health guideline exposure criteria.

Since it would be an unreasonable burden to require detailed measured exposure data for all sites, the Commission should consult with the U.S. Environmental Protection Agency for developing a scheme for making detailed measurements at a representative sample of sites with exposures below the Commission's exposure criteria in order to have exposure data to compare with future health data in order to determine if there are health effects associated with exposure and if there are any dose-response relationships.

2. Information item.

"Have schools, hospitals, businesses, and residences within 1000 meters of the proposed facility been provided information about the proposed facility and its potential radio frequency environmental effects according to Commission rules? Yes or No.

Have application responses describing the facility, its environmental impact, and other parts of the application designated as public information by the Commission been made available to the above parties in accordance with Commission rules? Yes or No" [see Petition for Reconsideration submitted by the Association in this proceeding, page 6,7 for specifics of suggested notification guidelines]

Utility: It is necessary for those who live, attend school, or work near a facility for which an action is proposed to be made aware of the requested action.

- (2.1) This is necessary in order to fulfill the intent of 47 CFR Part 1 §1.1307(c) providing for interested persons to allege to the Commission significant environmental effects pursuant to a requested action, otherwise categorically excluded, i.e. certain requests for approval of a new, renewal, or modification license. For without knowledge of a requested action and information on the state of knowledge of environmental effects of radio frequency, persons who have a legitimate interest will remain unaware of the requested action and its potential impact.
- (2.2) This is necessary in order to provide for additional sources of input of information needed for an environmental assessment given in §1.1311, and including §1.311(3) "whether construction of the facilities has been a source of controversy on environmental grounds in the local community," and (4) including nature and extent of any unavoidable adverse environmental effects, and any alternative sites or facilities which may have been or might reasonably be considered."

3. Information Item: Will persons be exposed under "occupational/controlled" environmental conditions concerning the facility for which application approval is requested? (Yes or No) If yes, attach documentation which describes and verifies that such "occupational/controlled" exposed persons are 'fully aware and in control of their exposure.'

Are any such exposed persons represented by a bargaining unit? (Yes or No). If yes, then attach a statement certifying that such bargaining unit has been informed at least four weeks prior to submitting this application, of intent to submit, and attach any comments of such unit regarding whether it finds that exposed persons are 'fully aware and in control of their exposure.'

Utility: To fulfill the Commission rules that only persons who are 'fully aware and in control of their exposure' are exposed to 'occupational/controlled' exposure levels, it is necessary to verify that the conditions are met whereby such exposures are permitted. By providing a means for bargaining units to be made aware of and provide input to the Commission, the Commission helps assure it is receiving the necessary input to assure that Commission rules are met that only those 'fully aware and in control of their exposure' are so exposed, thereby helping to assure worker health and safety and the public interest.

(b) The accuracy of the Commission's burden estimate: To notify nearby schools, hospitals, putting a notice by the facility, and notifying the local jurisdiction concerning an application to be submitted to the Commission according to the rules to be set by the Commission should take relatively little time. In many cases just a letter to a school district and local jurisdiction.

Likewise notifying employee bargaining units should take little time. The substantive discussions that may occur due to such notifications are important in any case and are in the public interest.

(c) Ways to enhance the quality, utility, and clarity of the information collected

Commission licensees are reporting, "determining the licensee of nearby facilities will be difficult, and determining their power and frequency will be nearly impossible." [reported by the Personal Communications Industry Association petition for reconsideration (Sept. 6, 1996) in this

proceeding at page 15, and supported by the response of AT&T (Oct. 8, 1996) at page 5 and 6]. Indeed, this is one of the key reasons that categorical exemptions are requested and why a delay in implementing Commission rules are being requested by many operators.

Therefore, utility of the data can greatly be enhanced, and greatly ease the burden of applicants, and make what is 'difficult' or 'nearly impossible' readily and easily available if collected data is properly entered into a computer database. Then it will be readily accessible by the operators and by the public. Moreover, such a database capability will remove much of the 'burden' some operators perceive in complying with the Commission's present 1% 'trigger' limit, and in complying with the Commission's schedule to implement its rules. Thus, many difficulties appear to be lessened with the increased utility of having the data properly entered into databases with proper interfaces.

Moreover, it appears that the systems needed to overcome the above named difficulties may currently be available for obtaining all Commission licensees within a certain radius of a site at a given latitude and longitude, e.g. Interactive Systems, Inc. ("ISI") for a very modest cost has such a system currently available. ISI states that it, "is the only FCC authorized provider of interactive access to the most current FCC licensing data." ISI reports it has no sign-up charges, no monthly fees, access is readily available using most communications software packages, and that all 'hourly' charges are on a per minute basis, with many simple queries of the Commission sites within a certain radius of a location taking only a few minutes, and costing less than \$5.00, thus making it a readily available low cost method of determining all facilities near a given location (assuming geographic latitude and longitude are correct - which may currently not be the case and is in need of updating.).

See Exhibit for example of capability of Interactive Systems, Inc. Note, material provided is not intended to promote this particular company, but only to demonstrate there is currently a readily available system (upon updating of latitude and longitude of sites) for identifying all Commission licensees in an area.

[Note: For database results to be meaningful, the geographic latitude and longitude inputs must be very accurate, and is possible now using satellite enhanced geographic location measurement systems. Common carriers can certainly provide these measurements, which are understood to be relatively fast to make, and could be done during a routine maintenance at a facility. The Commission may arrange with common carriers a means whereby for a modest fee they also provide such measurements for amateur radio operators or others who may not have the need to routinely make such measurements, or perhaps the Commission may find other means of obtaining up to date exact geographic locations for its sites.]

(d) Ways to minimize the burden of the collection of information on the respondents, including the use of automated collection techniques or other forms of information technology

By collecting sufficient information to allow a database to determine approximate power density estimates for any given location the burden on Commission licensees can be greatly minimized.

While some operators have suggested that a 'site owner' be responsible for monitoring exposure at a site, this may not be realistic or even possible, since transmitters on different properties, owned or leased by different 'site owners' may make comprehensive consideration of all sources of exposure difficult and burdensome without such an on-line database system.

Conversations with Interactive Systems, Inc. suggest that this company or other companies contracting or otherwise coordinating with the Commission and using its databases, may be able to modify current databases and interface software to permit convenient:

- 1. Listing of all transmitters within a specified radius of a site, the maximum ERP, and other characteristics needed for determining exposure compliance, and
- 2. May actually have sufficient information and software to provide exposure estimates using a methodology which the Commission sanctions as authorized estimates which may be used in lieu of on-site measurements, at least for a reasonably large proportion of sites, with other sites

having actual measurements over time to validate the monitoring methodology and indicate any needs for improving the methodology.

The fact that a small insignificant charge may be made for applicants to receive the needed data from a Commission licensed contractor should not be a cause for removing this efficient means of obtaining needed data from serious consideration.

Respectfully submitted,

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David Fichtenberg

Spokesperson for the Ad-Hoc Association of Parties Concerned About the Federal Communications Commission Health and Safety Rules

Dated: October 15, 1996

David Fichtenberg
Ad-Hoc Association of Parties Concerned About the
Federal Communications Commission Health and Safety Rules
PO Box 7577
Olympia, WA 98507-7577

Submitting one original and fourteen copies to the Secretary, Federal Communications Commission, 1919 M Street, N.W., Room 222, Washington D.C., 20554

Exhibit 1 providing example to demonstrate that FCC databases and interfaces are available for identifying FCC licensees within a given distance from a specified facility, and having capability of interactively providing power, frequency, and other data needed to estimate exposure.

Example from services of Interactive Systems, Inc.

If geographic location in lattitude and longitude were updated in the FCC database to be exact, and perhaps additional transmitter data were input, then exposure estimates may be provided.

FCC DATABASES AVAILABLE

- · Tower File
- FAA Airport File Retrieval Using the Antenna Survey System
- Private Radio Microwave
- · AM, FM, TV
- Broadcast Auxiliary
- Common Carrier MultiPoint Distribution Service Licenses & Applications (Part 21.900)
- PRB Land Mobile Licenses & Applications, Pending & Granted (Part 90 & Part 95)
- Common Carrier Bureau Land Mobile Licenses, Pending & Granted
- FCC Administrative Tracking Information
- Telephone Interconnect System (Part 68)
- Satellite Earth Station
- Coast and Ground
- Amateur
- Marine

All Rights Reserved.

Interactive Systems, Inc. 1601 N. Kent Street, Suite 1103 Arlington, VA 22209

Phone (303) \$12-0070- B-12 - -> (1/1)-- 5°(/5 (703) 212-6275 (703) 247-5445

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Oct-04-96 03:56P Dan Roberts

In What Format Do You Wish to Display/Print The Data?

-1 - Detail (standard)

- Short version (3 line summary by Frequency)

Please Enter Desired Number: 2

Enter Latitude (Nddmnss): n474500

Enter Longitude (Wddammes): w1222000

Please Enter Radius of Circle (NNNN.NN): 25

Do you want to limit your search using a frequency range? Enter Y or N: y

You can search on frequencies using Megahertz, Gigahertz, or Kilchertz. eg. M153.95 G.15395 K153950 are all equivalent

The first frequency entered is either the low side of a range . . . OR the first of one or more frequencies for which you desire an exact match (up to 50). Carriage return to second (blank) frequency to enter high side of a range.

Enter frequency: m869 Enter frequency:

Enter high side of frequency range: m890
Do You Wish To Select By Radio Service Code ? (Y/N) : y
PLEASE Enter Radio Service Code XX : cl
PLEASE Enter Radio Service Code XX :

Please validate the parameters you have entered:

Latitude: N474600 Longitude: W1222000 Radius: 25.00

Lower Frequency of Range: M869.0 Higher Frequency of Range: M890.0

Radio Service: CL

Are these values correct? (Y or N): y Preparing query . . . Processing query . . .

QUERY DATE: 22-Mar-95

Prequency Licensee Callsign File Number Exp Dt Cls Units S Location St Sv Lat Long Dist Bearing Asams Str-Hgt Hgt-Tip Heat Power Exp Rad-Op Phone LestChg Type

^{670.03000} INTERSTATE MOBILEPHONE C KNRA304 00588CLCL 890401 FB 1.0
MONROE 3310 191ST AVENUE SOUT WA CL 47-52-38 121-58-30 18.28 65.2
0 0 0 0 0 0.00 0.00 .0 000000

---- 43404 AVENUE BOUT WA CL 47-52-38 121-58-30 18,28 65.2 Ω 0.00 0.00 .0 000000 01876CLCL 941001 FB 870.03000 INTERSTATE MOBILEPHONE C KNKA304 1 G SAMMAMISH 22200 NE 12T WA CL 47-37-14 122-02-40 16.79 126.7 0.00 0.00 .0 000000 870.03000 INTERSTATE MOBILEPHONE C KNKA304 01876CLCL 941001 FB SQUAK MOUNTAIN LOOP FO WA CL 47-30-59 122-03-06 21.69 142.6 ٥ 0.00 0.00 0 000000 01876CLCL 941001 FB 870.03000 INTERSTATE MOBILEPHONE C KNKA304 EVERETT LAKE STEVENS P.U.D. WAT WA CL 49-01-29 122-04-40 21.39 33.5 0 0.00 0.00 0 000000 01876CLCL 941001 FB 870.03000 INTERSTATE MOBILEPHONE C KNRA304 1. G COTTAGE LAKE 17520 AVO WA CL 47-45-25 122-04-47 11.79 93.1 D 0 0.00 0.00 .a 0 000000 01876CLCL 941001 FB \$70.03000 INTERSTATE MOBILEPHONE C KNKA304 1 G 19501 SOUTHEAST 145TH WA CL 47-28-20 122-04-52 23.48 149.8 0 0 0 0.00 0.00 .0 000000 870.03000 INTERSTATE MODILEPHONE C KNKA304 00588CLCL 890401 FB RENTON 19501 SOUTH EAST 145TH WA CL 47-28-21 122-04-52 23.45 149.8 0 0 0 0.00 0.00 .0 000000 \$70.03000 INTERSTATE MOBILEPHONE C KNKA304 01876CLCL 941001 FB 1 G REDMOND, 18150 REDMOND WA CL 47-39-58 122-05-49 12.99 122.1 000000 0 0.00 0.00 .0 870.03000 INTERSTATE MOBILEPHONE C KNKA304 01876CLCL 941001 FB 1 G MOODINVILLE MALTBY 92ND AVENUE SE WA CL 47-49-25 122-06-09 11.40 69.7 0.00.0 00.0 0 *,* 0 🗓 000000 870.03000 INTERSTATE MOBILEPHONE C KNKA304 01876CLCL 941001 PB BELLEVUE EASTGATE SE90 2800 156 WA CL 47-35-06 122-07-50 15.69 142.9 0 0 0.00 0.00 .0 000000 0 870.03000 INTERSTATE MOBILEPHONE C KNKA304 01876CLCL 941001 FB BELLEVUE OVERLAKE GROUP HEALTH H WA CL 47-37-40 122-08-43 12.97 137.5 0 000000 0.00 0.00 .0 O 870.03000 INTERSTATE MOBILEPHONE C KNKA304 01876CLCL 941001 FB RENTON MAY CREEK 11224 138TH A WA CL 47-30-10 122-09-16 20.03 155.3 0 0.00 0.00 .0 000000 0 870.03000 INTERSTATE MOBILEPHONE C KNKA304 01876CLCL 941001 FB WOODINVILLE WOODINVILLE 17713 WOODI WA CL 47-45-26 122-09-27 8.18 94.5 870.03000 INTERSTATE MOBILEPHONE C KNKA304 01876CLCL 941001 FB BELLEVUE LAKE BELLEVUE 13400 NOR WA CL 47-37-43 122-09-30 12.53 139.4 0 0 0.00 0.00 .0 000000 O 01876CLCL 941001 FB 870.03000 INTERSTATE MOBILEPHONE C KNKA304 BRIDLE TRAILS, NORTHEA WA CL 47-39-59 122-09-48 10.50 131.1 REDMOND 000000 0.00 0.00 .0 ۵ ۵ 870.03000 INTERSTATE MOBILEPHONE C KNKA304 01876CLCL 941001 FB 1 G

Online FCC Database Menu

17

The Most Current FCC Data Available

1. Fill In the Pollowing Client Information:

Name	Title
Company	
Street	Suite
City	StateZip
Phone ()	Fax ()
2. Select the Databa	se Access Method:
	1200 Baud @ \$36/Hour (Dial Direct to ISI, Incur Longes Outside Metro Washington, D.C.)
	2400 Band @ \$54/Hour (Dial Direct to ISI, Incur Longes Outside Metro Washington, D.C.)
	9600 Baud @ \$100/Hour (Dial Direct to ISI, Incur Long es Outside Metro Washington, D.C.)
TOLL FREE 24 (800 Service, 1	es Ontside Metro Washington, D.C.) 100 or 1200 Baud (d) \$60/Hour All 10 Long Distance Charges)
TOLL FREE 96 (800 Service, I	No Long Distance Charges) O Baud @ \$100/Hour No Long Distance Charges) O Baud @ \$100/Hour No Long Distance Charges)

3. Complete the Authorization/lise Limitation Agreement:

I assume sole responsibility for all use of the databases and acknowledge that the Federal Communications Commission has sole responsibility for the accuracy of the Dalabases. I further agree not to resell, or make available to any third party conies of any portion of the databases received from ISI. I may provide third parties with products that include data derived from the Databases, so long as the products have value added, and are provided in other than the media and/or format in which the data was received from ISI.

agree to the above Use Limitation. Please bill access charges to the following Credit Card:

MC_	Visa	Acct. No.		Exp. Dat	e
	Print	Name	 Signature		Diste

Please Send Account Application on that ISI can bill me directly.

Most Companientions Suffrere Metryes (as procumi

1 - By Callsign Search for one, or up to 50 Callsigns. Results viewed in Administrative or Licease formal, Pending, Granted, or Both.

2 - By File Number

(4)

Search for one, or up to 50 File Numbers. Results viewed in Administrative or License format. Pending, Granted, or Both.

3 - By Frequency and State

Search for one Precuency and one State or nationwide. Licensee and l'ransmitter data are displayed.

4 - By Latitude/Longitude

Search for all Callsigns of licensees at that Lat/Long. ViewCallsign, Licensee, City, ST, Service Code.

5 - By Licensee Name (Zip)

Search for Licensees within a zig code, Use partial zip or Licensee information. Summary or full Calleign report.

6 - By Latitude/Longitude with Radius (with Frequency,

Frequency Range & Radio Service Code Scarch using Lat/Long., radius, frequency or range, multiple frequencies, all frequencies, and radio service. View in Standard or "Short" (sorted) format.

7 - Full License/Application By Callsign/File Number Search for license by Callsign or File Number. Full license displayed.

8 - End Users by SMR Callsign Search for SMR End Users by entering SMR Callsign View End User

Callsign, File No., Lacensee Address, Phone, Radio Service Status, etc.

9 - By Latitude/Longitude with Radius (& Callign) Scarch for specific Calleigns within a radius of selected Latlong. 10 - By Latitude/Longitude with Radius (& Licensee) Search for specific Licensee within a radius of selected Lattone.

11 - By Frequency Advisory Number

Search for Licensco(s) using Coordination Frequency Advisory Number.

20 & 21 - FCC Administrative Tracking Information Track applications and granted licenses by File Number or Callings.

30 - Batch Reports

Submit radius and other selected querys to run in background or overnight. Search results written as a file to Directory. Retrieved using Option 31.

31 - SOL Access

Perform "Ad Hoc" querys against the full database using SQL Create, execute, edit, save searches. Download, display results, refine, store querys.

40 - Part 68 Telephone and Interconnection Information Submenu: 1 - Ap Code, 2 - Prod Code, 3 - Pub Not Date, 4 - Reg. No. Search for equipment registrations, modifications, and reregistrations.

45 - Tower File

Search for towers within User selected radius, and tower height AGL.

46 - TowAir

Search for airports within User selected radius. Calculates glid: slope, ratio, pass/fail, and brief explanation of slope penetration results

50 Amateur Database Submenu: 1 - Callingo, 2 - Licensee and/or Zipcade

20

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Standard Report Formats

Fields in Standard Report

ADMINISTRATIVE DATA:

- Status
- Callsien
- File No
- . Attn. Line
- Licensee
- Licensee Address
- * Control Point Contact (Phone No)
- Radio Service
- Issue Date
- Expire Date
- * No. Mobiles Vehicle, Portable, Pagers

TRANSMITTER DATA:

- * Transmitter (TX) Latitude
- * Transmitter (TX)Longitude
- TX Address (Street, City, County, ST)
- Class of Station
- Frequency
- *TX Ant HAAT, Hgt to Tip, Gr. El Asmi
- *TX Radius of Operation...
- *Emissions
- Power Output
- · ERP No. Units Distance From Centerpoint
- Direction From Centerpoint (Bearing)

Fields in "Short "Report

• Status

- · Callsign
- * File No
- Licensee
- *Licensee Address (City, ST)
- *Licensee Phone Number
- * Radio Service
- Expire Date
- *No. Mobiles-Vehicle, Portable, Pager
- TX Latitude/Longitude
- Distance From Centerpoint
- * Direction From Centerpoint (Bearing)

Interactive Systems, Inc.

The Company:

(2)

Interactive Systems, Inc. (ISI) is the only FCC authorized provider of interactive access to the most current FCC Licensing Data.

ISI is a broad-based data processing company which was founded in 1991 by Donald C. Weymer with the murchase of one of the largest DEC/Vax commuter justallations in the United States. ISI's primary mission is to provide a field range of timesharing, outsourcing, and disaster recovery services to commercial and federal clients. In September 1992, ISI purchased the assets of ATAS, and acquired the Third Party Public Access Contract with the Federal Communications Commission. ISI has numerous other public and proprietary databases which are accessed by more than four thousand users throughout the United States, Europe, and the Middle East.

Services Available from ISI:

Timesharing.

Outsourcing

Disaster Recovery

Facilities Management

List Management

Broadcast Fax

Membership/Fundraisme

Laser/Impact Printing Private Bulletin Boards

(0)

important Phone Numbers:

ISI Main Number:

(703) 812-8270 247-5443

ISI Fax Number

(703) 812-8275 247-5445

ISI Tech Support:

(703) 8#1-5634- (After Business Hours)

ISI Customer Service

(703) \$12-8270 242-5442

Hours of Operation:

The ISI Data Center is staffed twenty-four hours per day. Monday - Friday and 7:30 ain to 6:00 pm Saturday and Sunday, excluding Christmas and New Years Day. Customer Service bouts are 9:00 am to 5:30 pm Monday-Friday.

Detabase Availability:

The FCC Database is available for access except when the Database is being updated which normally occurs between Midnight and 6:00 am eastern time Users are notified on the Login Banner of any preventive maintenance, or scheduled hardware/software upgrades which would result in the database being unavailable.

Limitation of Use of Data Provided by ISI:

All data and products provided to clients are subject to the Limitation of Use Agreement signed by the client at the time the data or products are purchased The Limitation of Use Agreement is printed on Page 22 of this Catalog.

Radio Service Codes

When sarching the PCC Database, part of the information motived is a two character code which ladientes the ficenses's type of Radio Service. While not all Radio Services are contained in the ISI FCC Database, the amjusty are. We have compiled a list of the Radio Services, and their associated earlies which can be found in the Database. The codes are.

odes v	MAN AND AN AND AND AND AND AND AND AND AN	coder ser.	and Armenia
BROA	DCAST SERVICES		LOCATION
BA	Awiliany Broadcast	as	Radiolocation
0 F	FM Broadenst	880 MI	z Conventional Systems
81	TV Broaders	GB	Conventional Business
	AL TIMEN SERIAL COS	Œ	Cour Public Safety/Spec Farces
	NON CARRIER SERVICES Domestic Pub. Land Mobile	CO	Conv Other Indi Lond Transport
CD		(F	Conv Public Safety/Special Emerg
CF	Point to Print Microware	CX.	Conventional SMR
æ	Donestic Public Air-Ground	200 LEI	iz trunkju systems
CL	Celhier Teleconematications	1/8	Trurket Business
CM	Multipoint Distribution	YF	Tracked Public Sefery/Spec Except
CO	Offshore Radiotelephone (ORTS) International Fixed Public Press	YO	Trusked Other Ind./ Land Trassport
CP		YP	Trunked Pub. Safety/Special Conerg
CR	Rund Radio	ΥX	Trusked SMR
AMA	TEUR SERVICES		
MA	Annicu		Is RAINO SERVICES
		QD	Non-Nationwide Date
	STRIAL SERVICES	QM	Non-Net wide Pub Selety/Mut Aid
18	Busines	QO.	Non-Nationwide Other
18	Forest Products	QT	Hon-Nationwide 5 Chamai Trunked
iM	Metion Picture	904 34	Ma PRIYATT: CARREER PAGING
12	Petroloum Special Industrial	GS.	Private Corrier Paging
15	Specie metasion Telephone Maintenance	900 M	ME SERVICES - PRIVATE RADIO
17	Viden Production	BURB	
1 V	PONCT	GA	Conv PS/Special Rung (End User)
	Manifestures	(H	Cone Other Ind Land Tremport
1X. 1¥	Rehy Pros	GR	900MHz Com Commercial SMR
		GU	Conventional Beniness
LAN	TRANSPORTATION SERVICES	YA	Trunked PS/Spec Emerg (End User)
ŁA	Attanuable Emergency	YL	Trunked Other Ind/Land Transport
L	Intervibus Passenger	YS	Tranked SMR
الدا الدا	Interarbas Property	YU	Trunked Buriness
내	Railroad		
LÜ	Urban Process		ing services
ľA	Urban Property	KA	Harrine Austriary Group
LX	Terricals	MC:	Coastal Group
Pili	BLIC SAFRTY SERVICES	HK	Alaska Group
P#	Fire	ИR	Marine Radiolocation Land
Pi	Highway Maintenance	MS	Ship Group
PL	Local Government	MX	Marstime Mubble Satellite
10			SONAL RADIO SPRVICES
27	Pedica		General Mobils
25	Special flancagency	X.A.	Cotas was
-3	-1		

INTERACTIVE SYSTEMS, INC. General Information

The Company:

1 1

Interactive Systems, Inc. (ISI) acquired ATA Services, In (ATAS) and is the only FCC authorized provider of interactive access to the most current FCC Licensing Data.

tSI is a broad-based data processing company which velounded in 1991 by Donald C. Weymer with the purchase of of the largest DECVax computer installations in the United States. ISIs primary mission is to provide a full range timesharing, outsourcing, and disaster recovery services commercial and federal clients. In September 1992, purchased the assets of ATAS, and acquired the Third Parablic Access Contract with the Redeal Communication Commission. ISI has numerous other public and propriet databases which are accessed by more than four thousand us throughout the United States, Europe, and the Middle East.

Innortant Phone Numbers:

IMMORRALL CROSS LANGE	200 200
ISI Main Number: ISI Pax Number:	(703) \$12,0070 (703) \$12,0070 (703) \$12,0070 (703) \$12,0070
ISI Tech Support; ISI Customer Service:	(703) 841-3634 (After Burinese Hours) (703) 8 13-827 0 (9:00em-5:30pm M-F)
Data Cantan Blanca and	247-5883

Date Center Hours of Openation:

The ISI Data Center is stoffed Monday-Friday, 24 hours per a Sat/Sun 7:00am-6:00pm excluding Christmat/New Years Day

Desabase Availability:

The PCC Database is available for access except when Database is being updated which normally occurs betw Midnight and 6:00 AM eastern time. Uses are notified on Login Banner of any preventive maintenance, or scheding the database which would result in the databaseing unavailable.

Limitation of Use of Data Per Chent's Contract:

- (i) User amorate sole apapointhity for all use of the databases arisovirdges that the Federal Communication Commission has responsibility for the accuracy of the Databases.
- (2) User facther agrees not to result or make available to any third p copies of any parties of the databases received from ISB. User provide third parties with products that lacted data derived from databases, so long as the products have raise added and are gravidationer than the media and/or format in which the data was received 15%.

Exhibit 2: Title page of U.S. Environmental Protection Agency report demonstrating the feasibility of developing estimates of power density exposure.

The Commission (with its contractors) may chose to build on the EPA methodology to develop a Commission certified method of estimating exposure at site using Commission database, Interactive Systems, Inc. or other contractor, and methodology similar to that used by EPA.

Random sampling of sites with actual measurements can validate methodoloty and be the means of improving it.

This demonstrates that by using the Commission database and power density exposure models, the Commission (or in cooperation with licensed contractors) can with much more ease than now anticipated monitor areas for compliance with exposure criteria.

DESCRIPTION DOCUMENTATION			
REPORT DOCUMENTATION PAGE	1. REPORT NO. EPA 52G/6-85-011	2.	PB8 5 2 458 68 /AS
4. Trie and Subtitle	sessment of the Potential	Impact of Faderal	5. Report Dete April 1985
	ion Guidance on the AM, F		6.
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7. Author(s) Paul C. Gai	iley and Richard A. Tell		8. Performing Organization Rept. No:
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16. Abstract (Limit: 200 wards)			
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